## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

Case No. 3:24-cr-00209-FDW-DCK

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID PAUL DANIEL,

Defendant.

UNOPPOSED MOTION TO CONTINUE TRIAL AND PRETRIAL MOTIONS DEADLINES

Defendant, David Daniel, moves the Court to continue trial to the next criminal trial term and correspondingly extend the deadline for any and all pretrial motions. In support of this Motion, Mr. Daniel shows the following:

- 1. The Pretrial Motions deadline is currently June 25, 2025.
- 2. Docket Call/Trial is currently set for July 7, 2025.
- 3. The government recently superseded the indictment to add a completely new set of allegations.
- 4. Counsel is anticipating additional discovery from the government related to the additional charges.
- 5. Counsel needs additional time to review and go over the new discovery with Mr. Daniel.
  - 6. The government does not oppose the relief requested in this Motion.

WHEREFORE, Mr. Daniel respectfully requests that the Court continue trial to a later criminal term and correspondingly extend any pretrial motions deadlines.

Respectfully submitted this 10th day of June, 2025.

/s/ William R. Terpening William R. Terpening N.C. Bar No. 36418

## TERPENING LAW PLLC

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Counsel for Defendant David Paul Daniel

## **CERTIFICATE OF SERVICE**

I certify that I have filed this **UNOPPOSED MOTION TO CONTINUE TRIAL AND PRETRIAL MOTIONS DEADLINES** through the Court's CM/ECF system, which constitutes service on all parties.

Dated: June 10, 2025.

/s/ William R. Terpening William R. Terpening